



**Qwest**  
607 14<sup>th</sup> Street NW, Suite 950  
Washington, DC 20005  
Phone 202.429.3121  
Fax 202.293.0561

**Cronan O'Connell**  
Vice President-Federal Regulatory

*EX PARTE*

June 19, 2003

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., TW-A325  
Washington, DC 20554

Re: *In the Matter of Telephone Number Portability*, CC Docket No. 95-116

Dear Ms. Dortch:

On June 18, 2003, Qwest representatives, Cronan O'Connell, Mary LaFave and Mike Whaley met via conference call with Jared Carlson, Pat Forster and Jennifer Sallet of the Wireless Telecommunications Bureau as well as Cheryl Callahan and Pam Slipakoff of the Wireline Competition Bureau. Qwest discussed three key issues and the recommended solutions that the Commission needs to rule on prior to the November 24, 2003 deadline for Wireless-LNP implementation, as outlined in the attached presentation.

In accordance with FCC Rule 47 C.F.R. §1.49(f), this *ex parte* is being filed electronically via the Commission's Electronic Comment Filing System for inclusion in the public record of the above-referenced proceeding pursuant to FCC Rule 47 C.F.R. §1.1206(b)(2).

Sincerely

/s/ Cronan O'Connell

cc: Jared Carlson (via e-mail at [jcarlson@fcc.gov](mailto:jcarlson@fcc.gov) with attachment)  
Pat Forster (via e-mail at [pforster@fcc.gov](mailto:pforster@fcc.gov) with attachment)  
Jennifer Sallet (via e-mail at [jsallet@fcc.gov](mailto:jsallet@fcc.gov) with attachment)  
Cheryl Callahan (via e-mail at [ccallaha@fcc.gov](mailto:ccallaha@fcc.gov) with attachment)  
Pam Slipakoff (via e-mail at [pslipako@fcc.gov](mailto:pslipako@fcc.gov) with attachment)

# Qwest<sup>®</sup>



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**Wireless-LNP Exparte  
June 18, 2003**

# Number Portability

- ❑ **All carriers are obligated to provide number portability by the FCC rules and provisions of the 1996 Act**
- ❑ **The FCC:**
  - **Provided different implementation schedules for wireline and wireless carriers**
  - **Implemented service provider and not geographic portability**
  - **Adopted rules developed by NANC which limited portability to wireline rate centers**
    - **NANC expressly advised the FCC that the wireless carriers did not agree with these rules**
- ❑ **November 24, 2003 is looming and the FCC has not resolved three (3) outstanding issues**

# Critical Outstanding Issues

## ❑ Competitive Neutrality

- Will porting from wireline to wireless carriers be limited to those wireline rate centers in which the wireless carrier has a presence?

## ❑ Appropriate porting interval

- 2 ½ hours as proposed by wireless carriers or the current 4 business day interval for wireline carriers?

## ❑ Need for an interconnection agreement or only an SLA with another carrier?

# Qwest's Position

## ❑ Competitive Neutrality

- The scope of all carriers' ability to port numbers should be the same
- If rate centers are expanded, there are significant consequences for wireline carriers
  - Network costs
  - IntraLATA toll revenue loss
- Even if rate centers boundaries are expanded to mirror state borders, parity between wireline and wireless carriers could not be achieved because MTAs often cross state boundaries

**Wireless carriers must have a presence in every wireline rate center from which they wish to port a number**

# Qwest's Position

## ❏ Porting Intervals

- Third party verification would be virtually impossible with a 2 ½ hour porting interval
- It would take significant investment to upgrade systems to handle a shorter porting interval and such increased costs would be passed on to end users

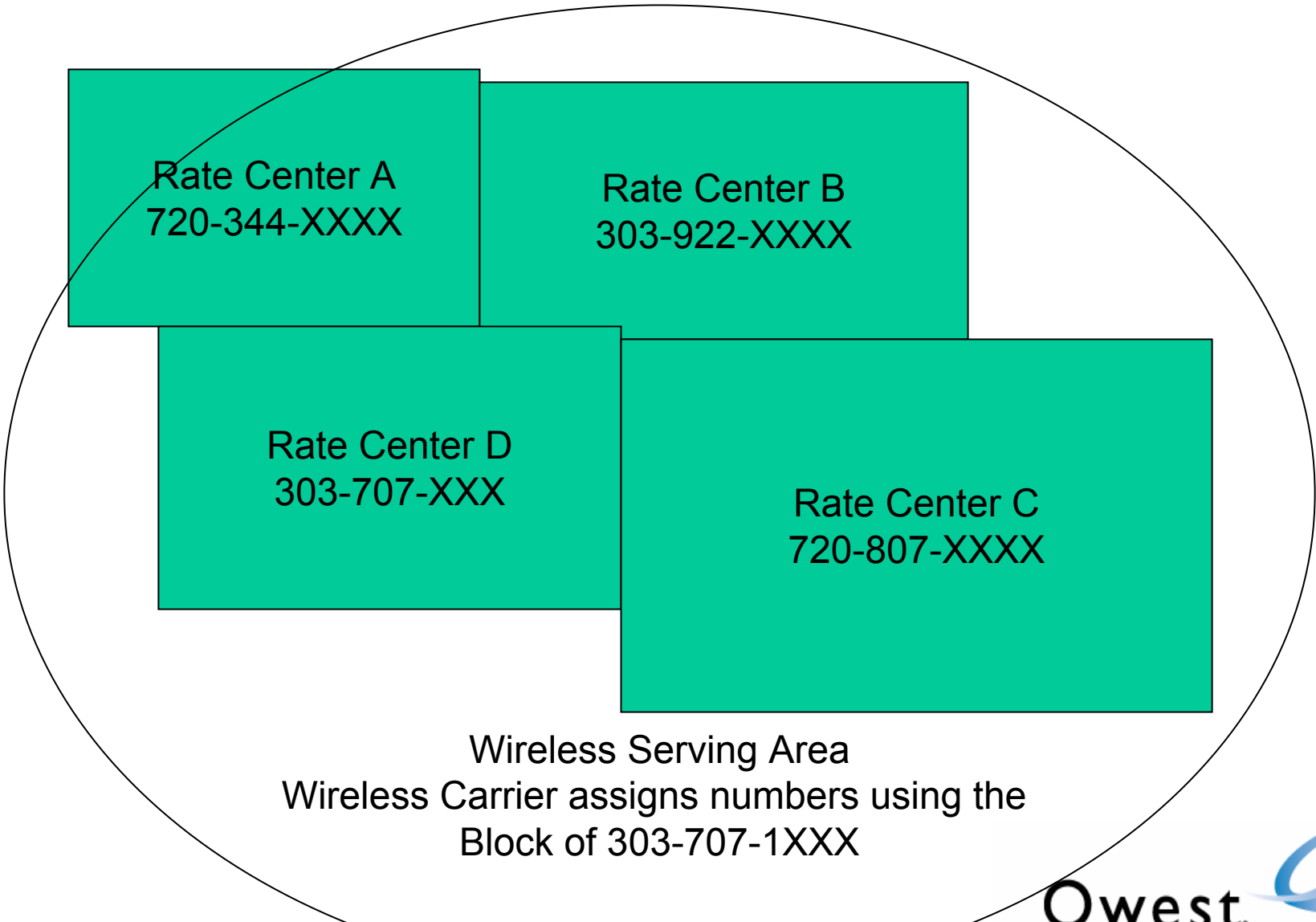
**Existing porting intervals (4 business days) should be observed with respect to ports from wireline carriers**

# Qwest's Position

## Porting Agreements

- Number porting is addressed in interconnection agreements today between wireline and wireless carriers
- Because porting affects the terms of interconnection, any SLA between a wireline and wireless carrier would still have to be filed with a state PUC
- Wireless carriers should be free to use SLAs with other wireless carriers

**Interconnection agreements should be required  
Between the wireline and wireless carrier**



A large black circle represents the 'Wireless Serving Area'. Inside this circle are four teal-colored rectangles representing different rate centers. Rate Center A is in the top-left, Rate Center B is in the top-right, Rate Center D is in the bottom-left, and Rate Center C is in the bottom-right. Rate Center C is the largest rectangle. Each rectangle contains text identifying the rate center and a phone number.

Rate Center A  
720-344-XXXX

Rate Center B  
303-922-XXXX

Rate Center D  
303-707-XXX

Rate Center C  
720-807-XXXX

Wireless Serving Area  
Wireless Carrier assigns numbers using the  
Block of 303-707-1XXX